

**IN THE UNITED STATES DISTRICT COURT  
FOR THE NORTHERN DISTRICT OF ILLINOIS  
EASTERN DIVISION**

SERGIO BONILLA, on behalf of himself	)	
and all others similarly situated,	)	
	)	Case No. 1:21-cv-00051
Plaintiff,	)	
	)	Hon. Judge Virginia M. Kendall
v.	)	
	)	Magistrate Judge Gabriel A. Fuentes
PEOPLECONNECT, INC., a Delaware	)	
Corporation,	)	
	)	
Defendant.	)	

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THERESA LOENDORF, on behalf of	)	
herself and all others similarly situated,	)	
	)	Case No. 1:21-cv-00610
Plaintiff,	)	
	)	Hon. Judge Virginia M. Kendall
v.	)	
	)	Magistrate Judge Gabriel A. Fuentes
PEOPLECONNECT, INC., a Delaware	)	
Corporation,	)	
	)	
Defendant.	)	

**DECLARATION OF TARA MCGUANE**

I, Tara McGuane, hereby declare:

1. I am the Associate Director of Compliance and IP at PeopleConnect, Inc. (“PeopleConnect”). I have been in that role since November 2020. In that role, I am responsible for drafting and enforcing the Terms of Service (“TOS”) and am familiar with how the TOS are

displayed on Classmates.com, both currently and historically. I previously held the position of Senior IP & Marketing Compliance Manager. I have worked at PeopleConnect since 2002.

2. PeopleConnect owns and operates Classmates.com.

3. Classmates.com provides the general public access to an online database of alumni and yearbook information.

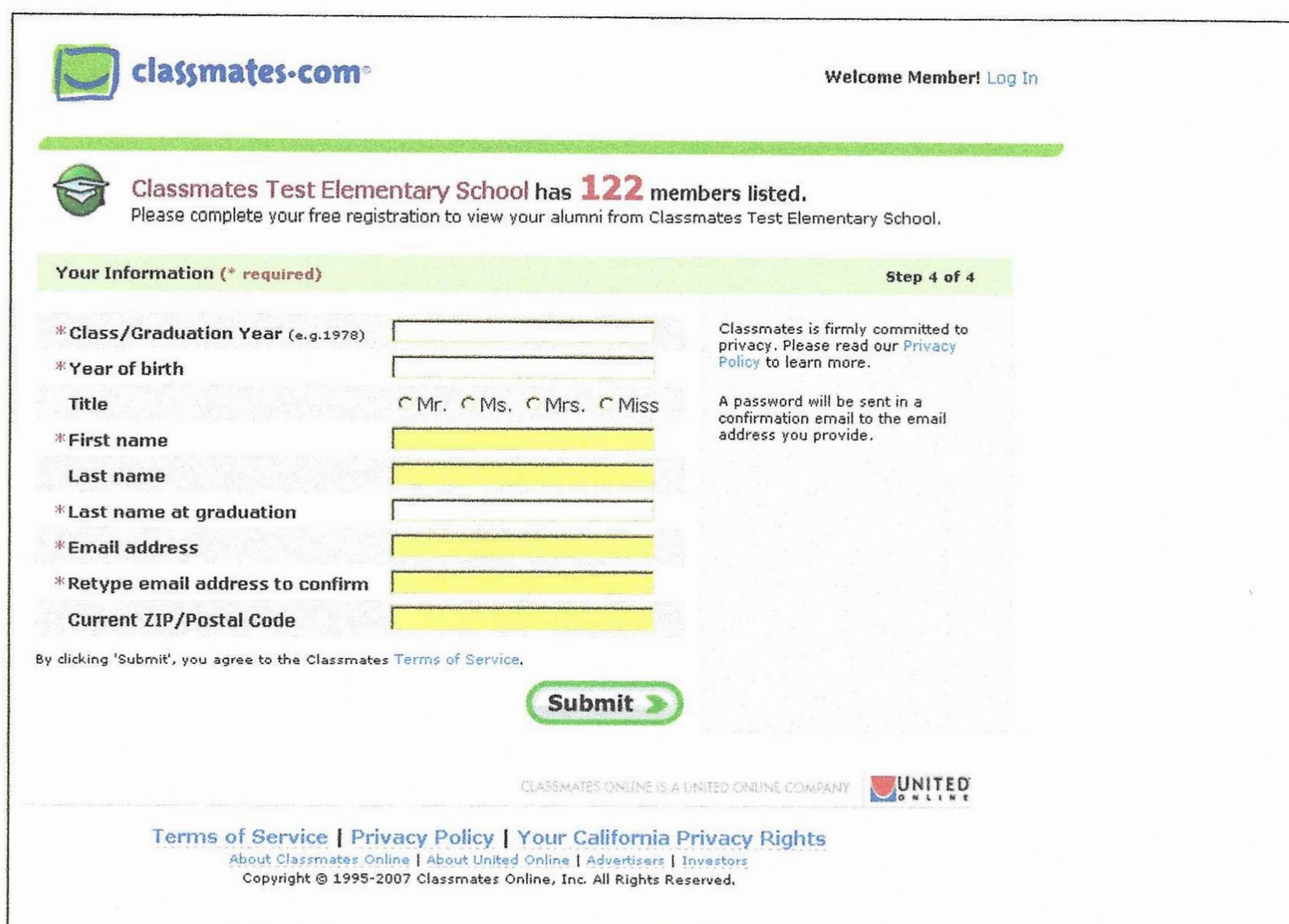
4. I previously submitted a declaration on May 10, 2021.

5. As previously stated in my May 10, 2021 declaration, Mr. Sergio Bonilla could not have created his account on Classmates.com without first agreeing to the TOS by affirmatively clicking a button on the registration page.

6. I have reviewed Mr. Benjamin Osborn's June 7, 2021 Declaration. The images Mr. Osborn submitted are not of the registration page Mr. Bonilla would have had to complete to register for an account.

7. A true and correct copy of Classmates.com's registration page as it existed in 2007 is excerpted below:





**classmates.com** Welcome Member! [Log In](#)

**Classmates Test Elementary School has 122 members listed.**  
Please complete your free registration to view your alumni from Classmates Test Elementary School.

**Your Information (\* required)** Step 4 of 4

\* **Class/Graduation Year** (e.g. 1978)

\* **Year of birth**

**Title** ☐ Mr. ☐ Ms. ☐ Mrs. ☐ Miss

\* **First name**

**Last name**

\* **Last name at graduation**

\* **Email address**


\* **Retype email address to confirm**


**Current ZIP/Postal Code**

Classmates is firmly committed to privacy. Please read our [Privacy Policy](#) to learn more.

A password will be sent in a confirmation email to the email address you provide.

By clicking 'Submit', you agree to the Classmates [Terms of Service](#).

**Submit** 

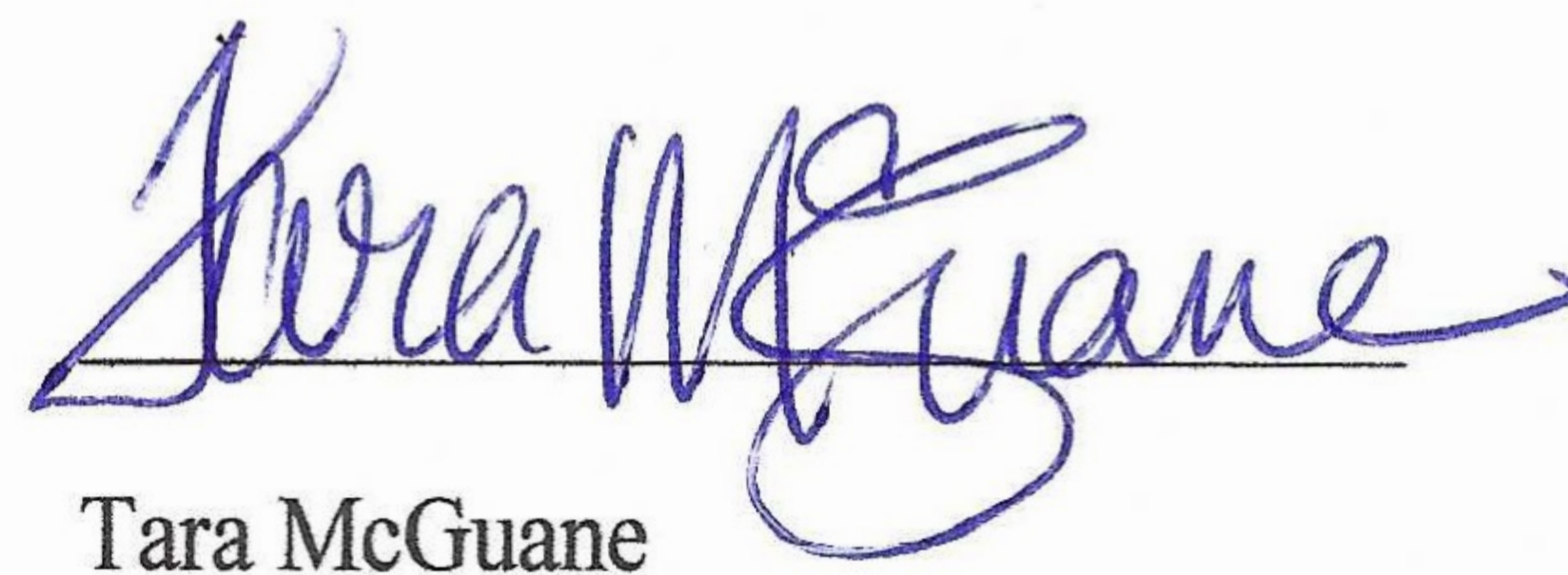
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8. This screenshot is materially identical to the registration page Mr. Bonilla would have seen.

9. Mr. Bonilla could not have registered for an account without hitting the “submit” button, above which appeared the following message: “By clicking ‘Submit’, you agree to the Classmates Terms of Service.” The phrase “Terms of Service” was in blue text and was hyperlinked to the then-current TOS.

I declare under penalty of perjury under the laws of the United States that the foregoing is true and correct and that I executed this declaration on June 21, 2021 in Seattle, Washington.

  
Tara McGuane